

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

COSMOKEY SOLUTIONS GMBH & CO.)
KG,)
)
Plaintiff,)
) C.A. No. 18-1477-JLH
v.)
) **JURY TRIAL DEMANDED**
DUO SECURITY, INC. n/k/a DUO)
SECURITY LLC and CISCO SYSTEMS,)
INC.,)
)
Defendants.)

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Plaintiff CosmoKey Solutions GmbH & Co. KG (“CosmoKey”) and Defendants Duo Security, LLC and Cisco Systems, Inc. (collectively, “Defendants”) respectfully move this Court to schedule a teleconference to address the following outstanding discovery disputes:

Plaintiff’s Issues:

- Plaintiff’s request that Defendants produce metadata in connection with their prior and forthcoming document productions.
- Plaintiff’s request that Defendants make a complete production of relevant instant messages, including messages regarding Defendants’ knowledge of the Asserted Patent, Defendants’ development of the Accused Offerings and the operation of those Offerings.
- Plaintiff’s request that Defendants produce by a date certain (a) potentially comparable license or settlement agreements and negotiation documents, (b) acquisition and valuation documents related to Cisco’s acquisition of Duo, (c) transactional-level sales data for the period after Cisco’s acquisition of Duo, and (d) business documents such as board meeting presentations and minutes and commercial plans shared with investors and potential acquirers.
- Plaintiff’s request that Defendants include Mr. Kustarz as an ESI custodian.

Defendants' Issues:

- Defendants' request for the Rule 30(b)(1) deposition of Dominic Adenuga, the named inventor on the patent-in-suit and Managing Director of CosmoKey, on or before March 29.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer regarding Plaintiff's Issues by telephone on the following dates: February 13, 2024 and February 16, 2024. The parties also had subsequent written communications following the meet and confer.

Delaware Counsel for Plaintiff: Andrew L. Brown

Lead Counsel for Plaintiff: Scott T. Weingaertner, John Padro, Matthew R. Wisnieff, Lauren Kuehn Pelletier, and Timothy Keegan

Delaware Counsel for Defendants: Jennifer Ying

Lead Counsel for Defendants: Ryan Jin, Charlie Sim, Jaysen Chung (February 13), and Julian Manasse-Boetani (February 16)

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer regarding the Rule 30(b)(1) deposition of Dominic Adenuga by telephone on the following date: March 8, 2024. The parties also had subsequent written communications following the meet and confer.

Delaware Counsel for Plaintiff: Andrew L. Brown, David E. Moore, and Bindu A. Palapura

Lead Counsel for Plaintiff: John Padro, Matthew R. Wisnieff, and Timothy Keegan

Delaware Counsel for Defendants: Travis Murray

Lead Counsel for Defendants: Jaysen Chung, Ryan Jin, Charlie Sim, and Julian Manasse-Boetani

The parties are available for a teleconference on the following dates:

- March 21 (afternoon only)
- March 22

- March 26
- March 27

POTTER ANDERSON & CORROON LLP

By: /s/ Andrew L. Brown
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Dated: March 14, 2024
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